

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on July 7, 2002.

Permit Number: **R30-NGGP-2007-07100008**

Application Received: **April 30, 2007**

Permittee: **Columbia Gas Transmission Corporation**

Facility Name: **Seneca Compressor Station**

Mailing Address: **1700 MacCorkle Ave., SE, Charleston, WV 25314-1273**

Permit Action Number: *SM01*; Revised: *December 28, 2007*

Physical Location:	Seneca Rock, Pendleton County, West Virginia
UTM Coordinates:	639.50 km Easting • 4,301.10 km Northing • Zone 17
Directions:	Traveling US Route 33 East from Elkins, turn left at the intersection with State Route 28 (Seneca Rocks). Proceed approximately 2 miles to the station which is located on the left.

Facility Description

Columbia Gas Corporation's Seneca Compressor Station (CGT) is a natural gas transmission facility covered by NAICS 486210 and SIC 4922.

This significant modification involves the changes as reflected in the permit number R13-2715A, which is to replace the station's two existing natural gas-fired Allison turbines (Emission Points E02 and E03) with two natural gas-fired Solar Taurus (E05 and E06).

Other changes include updating the facility information, and regulatory language associated with the most recent version of the SIP approved State Legislative Rules. The monitoring requirements for the natural gas-fired turbine/compressor were revised.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2006 Actual Emissions
Carbon Monoxide (CO)	154.5	2.6
Nitrogen Oxides (NO _x)	220.4	8.0
Particulate Matter (PM ₁₀)	5.0	0.1
Total Particulate Matter (TSP)	5.0	0.1
Sulfur Dioxide (SO ₂)	0.9	0.0
Volatile Organic Compounds (VOC)	33.6	0.1
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
Total*	1.42	0.04
* HAPs are not speciated because no applicability was triggered.		
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

This facility has the potential to emit 220.4 tons per year of Nitrogen Oxides (NO_x) and 154.5 tons per year of Carbon Monoxide (CO). Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Columbia Gas Transmission Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR13	New Source Review permits for stationary sources
	45CSR11	Standby plans for emergency episodes
	45CSR14	Permits for Construction and Major Modification of Major Stationary Source of Air Pollution for the Prevention of Significant Deterioration
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

	40 C.F.R. Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45 CSR17	To Prevent and Control Particulate Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R30-10300010-1996	July 7, 2002	
R13-2715A To install two Solar Taurus turbines to replace two existing Allison turbines	December 18, 2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

A determination was made that 45CSR10 does not apply to engines and compressors. Since the two (2) 2.5 MMBtu/hr heating system boiler are each less than 10 MMBtu/hr, they are exempt from sulfur dioxide weight emission standards for fuel burning units, registration, permits, testing, monitoring, and recordkeeping, 45CSR§§10-3, 6 through 8. The Seneca facility does not refine or process gas streams, therefore, it is not subject to 45CSR§10-5. Also, since the Seneca facility is not a manufacturing process, it is not subject to 45CSR§10-4.

The two (2) 2.5 MMBtu/hr heating system boilers are exempt from monitoring and testing under 45CSR2 and 45CSR2A since they are fueled by natural gas. Since the design heat input of the heating system boilers are less than 10 MMBtu/hr, they are not subject to 45CSR2A, per 45CSR§2A-3.1. According to 45CSR§2-11.1, the heating system boilers are also exempt from Sections 45CSR§§2-4, 5, 6, 8 and 9; Weight Emission Standards, Control of Fugitive Particulate Matter, Registration, Testing, Monitoring, Recordkeeping and Reporting, and Start-ups, Shutdowns and Malfunctions, respectively. The Director reserves the right to require testing pursuant to 45CSR§§ 2-8.1.b and 2-8.1.c.

R13-2715A

R13-2715A is permit replacing two existing natural gas-fired Allison turbines (existing emission points E02 and E03) with two natural gas-fired Solar Taurus turbines (proposed emission points E05 and E06). The Solar Taurus turbines limit the formation of NO_x, CO, and VOC by pre-mixing air and fuel prior to combustion. These turbines are scheduled to be installed in 2008.

Columbia Gas is also required to show compliance with the CO emission limits contained in Sections 4.1.1 and 4.1.4 of R13-2715A by performing initial and periodic performance tests on each turbine using EPA approved methods (see Section 4.2.2.).

Solar Taurus turbines will be subject to 40 C.F.R. Part 60 Subpart KKKK.

Permit conversion to *General Permit to Operate Natural Gas Compressor Facilities*

The permittee's facility currently operates under Title V Operating Permit R30-03100002-2004, issued on March 9, 2004. The pre-draft permit incorporated the changes described above in the **Emissions Summary**, and said permit was submitted to the permittee for a review prior to taking the permit to public notice. The permittee reviewed the pre-draft permit, and responded by requesting that the permit be converted to the *General Permit to Operate Natural Gas Compressor Facilities*, Permit No. R30-NGGP-2007, issued on June 14, 2007. Therefore, the following discussion will be based upon the format and characteristics of the general permit, and the permittee's general permit registration.

The final portion of the general permit registration provides a means of specifying those applicable 45CSR13/14 permits, consent orders, and other requirements not set forth in the General Permit. Permit R13-2715A will be listed in the general permit registration, thereby incorporating it by reference. Also, the permit writer examined the current Title V permit to determine if there were any requirements not already in the general permit, or incorporated by reference to the R13 permit.

40 C.F.R. Part 63 Subpart KKKK for Standards of Performance for Stationary Combustion Turbines is included in the general permit registration since it was not included in the general permit registration.

40 C.F.R. Part 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines

CGT – Seneca Compressor Station's two natural gas-fired Solar Taurus turbines will be subject to 40 C.F.R. Part 60 Subpart KKKK. 40 C.F.R. Part 60 Subpart KKKK regulates nitrogen oxide (NO_x) and sulfur dioxide (SO₂) emissions.

CGT will demonstrate compliance for the nitrogen oxide (NO_x) emission limitations by conducting an initial and subsequent performance tests as well as maintain records.

For sulfur dioxide (SO₂) emission, CGT will document that the fuel is covered by a valid tariff sheet or transportation contract limiting total sulfur content to ≤ 20 grains of sulfur per 100 standard cubic feet (40 C.F.R. §60.4365 (a)).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The two heating boilers are not subject to 45CSR10 since the design heat input for each heating system boiler is less than 10 MMBtu/hr.
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45CSR21	To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. This facility is not located in one of the affected counties.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
40 C.F.R. Part 60 Subpart Dc	Standards of Performance for Steam Generating Units. The Seneca Compressor Station is not subject to 40 C.F.R. Part 60 Subpart Dc since the boilers at this facility are less than 10 MMBtu/hr.
40 C.F.R. Part 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.
40 C.F.R. Part 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.
40 C.F.R. Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks at Seneca station are below 75 m ³ in capacity.
40 C.F.R. Part 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. The two new Solar Taurus turbines (E05 and E06) at Seneca Compressor Station are not subject to Subpart GG since they are subject to 40 C.F.R. Part 60 Subpart KKKK.
40 C.F.R. Part 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant. Seneca Compressor Station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.
40 C.F.R. Part 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Seneca Compressor Station is not subject to Subpart HH since Seneca Compressor Station is not a natural gas production facility.
40 C.F.R. Part 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. The Seneca Compressor Station transports more than 70.0 thousand standard cubic meter of natural gas per day but does not have a dehydration facility. The Seneca Compressor Station is not subject to Subpart HHH since the station does not have a dehydration facility as well as the station is not a major source of HAPs.
40 C.F.R. Part 63 Subpart YYYY	National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. Seneca Station is not subject to Subpart YYYY since it is not a major source of HAPs.
40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Seneca Station is not subject to Subpart ZZZZ since it is not a major source of HAPs.

40 C.F.R. Part 64	The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.
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Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: November 8, 2007
Ending Date: December 10, 2007

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

During the public comment period, the permittee requested administrative changes to R13-2715 along with an off-permit change and other changes to the general permit registration. These changes result in a new permit, R13-2715A. Any previous reference to R13-2715 in this fact sheet was changed to R13-2715A. These changes are listed below.

1. Replaced Attachment A with permit R13-2715A since it replaced R13-2715.
2. In column titled “Applicable Natural Gas General Permit (R30-NGGP-2007) Section” of the Emission Units Table, removed conditions associated with grandfathered sources (Emission Units ID’s 03701, 03704, 037G1, and 037G2).
3. In column titled “Applicable Natural Gas General Permit (R30-NGGP-2007) Section” of the Emission Units Table, the permittee requested the removal of Appendix A and Section 4.1.5 from Emission Units ID’s 03702 and 037023. Since the reference engines are identified in R13-2715A, no additional information is required.
4. Replaced the manufacturer and model number of the emergency generator (G2) listed Waukesha model VSG with an Ingersoll-Rand model PVG-4.
5. Revised the heading on page 4 from “45CSR13/14, Consent Order specific and Other Requirements not included in Title V General Permit” to “45CSR13/14 Permit, Consent Order, and Other Specific Requirements not included in Title V General Permit”.
6. A small indirect-fired gas heater was added to the Emission Unit table at the request of the permittee. The heater will be installed in 2008.